

## Rich, Christopher W. (Perkins Coie)

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**From:** Feldman, Stephen (Perkins Coie)  
**Sent:** Monday, March 10, 2014 9:35 AM  
**To:** Rich, Christopher W. (Perkins Coie)  
**Subject:** Fw: Fwd: Draft Work Plan - Non-Chemical Piping Assessment  
**Attachments:** image001.jpg; ATT00001.htm; ATI Queen Avenue Facility\_Non-Chemical Piping Assessment Work Plan\_Final 03-08-14.pdf; ATT00002.htm

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**From:** Dave Ellis [<mailto:DEllis@capacitycommercial.com>]  
**Sent:** Monday, March 10, 2014 09:31 AM Pacific Standard Time  
**To:** Feldman, Stephen (Perkins Coie)  
**Subject:** Fwd: Draft Work Plan - Non-Chemical Piping Assessment

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Sent from my iPhone  
Dave Ellis

Begin forwarded message:

**From:** "Ransdell, Robert" <[RRANSDELL@nrcc.com](mailto:RRANSDELL@nrcc.com)>  
**Date:** March 8, 2014, 10:38:37 AM PST  
**To:** "Heister, Dan" <[Heister.Dan@epa.gov](mailto:Heister.Dan@epa.gov)>  
**Cc:** "[dave@capacitycommercial.com](mailto:dave@capacitycommercial.com)" <[dave@capacitycommercial.com](mailto:dave@capacitycommercial.com)>, "Jonathan Sheckard" <[jsheckard@rivercityusa.com](mailto:jsheckard@rivercityusa.com)>, "Petersen, James C." <[JPetersen@ene.com](mailto:JPetersen@ene.com)>, "Villa, Clifford" <[Villa.Clifford@epa.gov](mailto:Villa.Clifford@epa.gov)>  
**Subject:** RE: Draft Work Plan - Non-Chemical Piping Assessment

Dan –

Thanks for the comments – I've incorporated a table of action levels in this revised plan that indicates when the crew will be required to upgrade to Level B personal protective equipment. Moving forward, I will touch base with our Regional Safety Manager to obtain the necessary supplies to perform our own industrial hygiene air monitoring by the time that this two-day phase is complete. I'm going to guess that I'm the only one in this office that has run an FID, and that was probably over 20 years ago, so I would assume that we will either obtain a photoionization detector with 11.7 eV lamp and/or colorimetric indicator tubes.

On the other matter you touch on, I can turn around a work plan to address the carbon filtration units, Graft reactor and AN tank/pumps in fairly short order once we have a clear idea on the following items:

1. The disposition of any wastes generated, and the allowable forms for acceptance by any TSDF.
2. The restrictions on activities carried out on the Queen Avenue facility that impact the ability to carry out certain transfer or cleaning activities at the facility.

The first item will ultimately require information on the ignitability and corrosivity of the proposed wastes, which hopefully EnE can obtain in fairly short order, and some legwork by WasteXpress as well. WasteXpress is waiting on approval of a contract with River City or the property owners, so

hopefully that doesn't present a bottleneck. You may be able to address the second item if you already have a clear idea of what a safe radius would be around any carbon transfer operation or Graft reactor cleaning operation and whether that radius disallows any such operations on the Queen Avenue facility.

Regards,

**Bob Ransdell**  
Project Manager

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